



5. Attached hereto as **Exhibit 4** is a true and correct copy of records from Plaintiff's file at the Jackson Clinic, which BT received in response to a subpoena.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff's Performance Document History, bearing bates number P 000037. Note, this is the same document that was attached as Exhibit 5 to the Declaration of Edna D. Guerrasio, which was submitted in support of Defendant's moving brief. I submit the document herewith, as a more legible copy for the court's convenience.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



EDNA D. GUERRASIO

Dated: Newark, New Jersey  
September 19, 2013

# **Exhibit 1**

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

NADINE RANADE :  
:  
PLAINTIFF :  
:  
V. : Civil Action No.  
: 1:12cv1039  
:  
BT AMERICAS INC. :  
:  
DEFENDANT :

The Video Deposition of NADINE RANADE,  
was taken on Thursday, July 11, 2013, commencing  
at 9:32 a.m., at the Offices Proskauer Rose,  
1001 Pennsylvania Avenue NW, Washington, D.C.,  
before Ryan K. Black, Notary Public, Registered  
Professional Reporter.

Job No. NJ1698437

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1 Q. And so while you're on the technical  
2 side, --

3 A. Mm-hmm.

4 Q. -- he was part of the big-picture  
5 relationship between BT and Capital Group. Is  
6 that fair to say?

7 A. That is correct.

8 Q. He was the guy in charge? Is that  
9 -- is that fair for your -- in other words  
10 -- let -- let me withdraw that question.

11 A. Mm-hmm.

12 Q. If the client was happy, unhappy --

13 A. Mm-hmm.

14 Q. -- with how things were going in the  
15 relationship, --

16 A. Mm-hmm --

17 Q. -- is it your understanding that, for  
18 example, the Capital Group would communicate  
19 with David Upton?

20 A. Yes. That is my understanding. And I  
21 would have expected David to come and  
22 communicate it to me.

23 Q. Okay. But you didn't -- you didn't  
24 have a direct reporting relationship --

25 A. With David Upton.

Veritext/NJ Reporting Company

800-227-8440

973-410-4040

1 know, she -- there were just negative vibes. I  
2 tried very hard to build a relationship with  
3 Barbara because, with certain client and program  
4 management relationship, sometimes you build a  
5 relationship with that individual to make them  
6 comfortable in terms of them trusting you, you  
7 know, professionally and stuff. And so -- so I  
8 would -- I even went to the length of asking  
9 her, do you want to have lunch and let's talk  
10 and stuff. You know, and I wasn't very good at  
11 those things because I felt I have to do my  
12 work, deliver the project, and be done with it.

13 Q. So when you say you were not good at  
14 those things, what are the things that you were  
15 referring to that you were not good at?

16 A. I would say, like, relationship  
17 building in terms of, like, you know, being  
18 a little more political in terms of, you know  
19 -- so I tried, and it didn't work with Barbara.  
20 But then I came back, and -- and I told my  
21 colleagues the whole story, and they said it  
22 would have never worked with Barbara, because  
23 they had some other experiences.

24 Q. Who else had similar experiences with  
25 Barbara?

1 wrong way, Nadine. So you have to work towards  
2 changing that perception.

3 That's one thing -- she very  
4 specifically said that to me. So I'm, like,  
5 Jayne, you have to help me. Teach that as a  
6 supportive manager. And then she was quiet,  
7 so --

8 Q. Well, was one of the ways to help  
9 you in this perception and with relationship  
10 building asking you to put together and do  
11 research on a -- a training on soft skills?

12 A. Yeah. Yeah.

13 Q. Okay. And did doing that research  
14 -- sorry. Did -- doing that research and  
15 putting that PowerPoint together and doing the  
16 training, was that educational for you?

17 A. Yes. I did read a lot of management  
18 books and stuff and -- and learned some key  
19 things and -- which I'm applying now. Yeah, I'm  
20 always learning.

21 Q. Okay. One of the things also that  
22 you said you were not good at was that you  
23 could -- I think you used the words you could  
24 have been better politically, or words to that  
25 effect, and I can -- we can go back and look at

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1 Q. And one of the reasons she said no --

2 A. Mm-hmm.

3 Q. -- was relating to these soft skills,  
4 wasn't it?

5 A. Right. But being a principal,  
6 it's not -- it's irrelevant, because it's a  
7 technical, you know, level.

8 Q. So is a principal a promotion?

9 A. Yeah. Just like consultant to senior  
10 consultant.

11 Q. You'd still be in the same --

12 A. Technical pool.

13 Q. The same technical pool; --

14 A. Yes.

15 Q. -- is that correct?

16 A. You're just a little more -- like,  
17 okay, you have more knowledge -- or, you know,  
18 you're a little more knowledgeable or expert in  
19 project management, program management now.

20 Q. Right. But -- and so it's your view  
21 that --

22 A. Mm-hmm.

23 Q. -- improving those soft skills and  
24 having those soft skills is not relevant to  
25 being promoted to principal?



1           A.    It's always relevant in my  
2           profession because you do interact with the  
3           customers and other colleagues. I think at any  
4           point in anyone's career soft skills are  
5           relevant; however, I feel it's not their -- it's  
6           not the it thing.

7           Q.    Okay. But Jayne disagreed with you,  
8           right? She -- isn't it your understanding that  
9           Jayne --

10          A.    Yeah. Mm-hmm.

11          Q.    -- thought it was highly relevant to  
12          whether you were going to be promoted or not?

13          A.    She never came across and gave me  
14          that this was the only reason about soft skills  
15          that that's holding me back. But that was the  
16          only reason she gave me.

17          Q.    Well, what about your -- you applied  
18          -- let me withdraw that.

19          A.    Mm-hmm.

20          Q.    You applied and submitted a  
21          document -- a lengthy document in support of  
22          your request to be promoted to principal in or  
23          around September of 2009, correct?

24          A.    Yes.

25          Q.    Okay. The time period that you

1           A.    Yeah.  And there -- I had asked Jayne  
2           to -- to do a meeting with Steve Kurtz, and  
3           there was no follow-up by her.

4           Q.    Have you ever received an e-mail from  
5           anyone in your entire career, --

6           A.    Mm-hmm.

7           Q.    -- other than this one, --

8           A.    Mm-hmm.

9           Q.    -- telling you not to have any further  
10          communication, by e-mail or phone, with a  
11          client?

12          A.    Not that I recall, no.

13          Q.    Okay.  Was this a big deal?

14          A.    Yeah.  It -- it -- it was very  
15          upsetting.  And I asked Jayne, and I requested  
16          -- I said, Jayne, I want to understand the  
17          issue.  Can you please arrange a call with Steve  
18          Kurtz so we can openly discuss the matter?  She  
19          never --

20          Q.    Who is Steve Kurtz?

21          A.    He's the account manager.

22          Q.    At BT?

23          A.    Yeah.  BT -- to P&G.

24          Q.    And who's Joe Busch?

25          A.    I think he's director.  I'm not sure.

1 project, --

2 A. Yeah.

3 Q. -- you were told -- you were told --

4 A. That I was late.

5 Q. -- you were off this project, right?

6 You just said that. They were taking you off  
7 this account. Yes?

8 A. Yes.

9 Q. And my questions, and I'm not asking  
10 about P&G in general, I'm asking about this  
11 project, --

12 A. Yes. Mehoopany project.

13 Q. -- do you have any understanding that  
14 P&G didn't want you on this project anymore  
15 because of your performance?

16 A. On Mehoopany, yeah. I guess. I -- it  
17 was never clarified to me anywhere in the  
18 e-mails.

19 Q. I'm not asking you about e-mails.

20 A. Yeah.

21 Q. I'm asking you, do you have an  
22 understanding that Procter & Gamble didn't want  
23 you working on this project because they didn't  
24 think you were doing a good job?

25 A. No. I don't have that understanding.

1 BY MR. BROWN:

2 Q. Have you reviewed this document?

3 A. Not fully, but I browsed through it.

4 Q. Okay. Does it refresh your  
5 recollection, --

6 A. Mm-hmm.

7 Q. -- now, that Procter & Gamble was  
8 extremely dissatisfied with your performance on  
9 this project --

10 A. I --

11 Q. -- that you had significant  
12 communication and miscommunications with the  
13 client and internally at BT, and that you were  
14 being removed from the account? Does this  
15 refresh your recollection in any way about the  
16 significance of the performance deficiencies on  
17 this project?

18 A. I just want to reiterate what you said  
19 first.

20 About my performance on Procter &  
21 Gamble account is -- as a Procter & Gamble being  
22 dissatisfied is incorrect.

23 On Mehoopany project, I agree with. I  
24 see that, that, you know, Karen had some issues  
25 regarding me missing her on the kickoff meeting

1 and arriving late at the site, and changing the  
2 vendor, which was not my call. It's actually  
3 Barbara's call. So --

4 Q. Right. But the perception was by the  
5 client that you were not --

6 A. Right. By Karen.

7 Q. -- that you were not performing to  
8 their expectations, right?

9 A. That is what I understand from this.

10 Q. And there were some -- also, does it  
11 refresh your recollection that notwithstanding  
12 being directed not to have communications with  
13 Procter & Gamble on this project that you did so  
14 anyway?

15 A. I -- no, I followed through with what  
16 -- if you see the let -- as a formal reminder  
17 and do not contact anyone via phone and  
18 e-mail -- wait. Sorry. If you see, finally,  
19 the last paragraph, --

20 Q. Mm-hmm.

21 A. -- it says, I heard your perspective  
22 that the only person you contacted contacted P&G  
23 after I asked you not to. After noon Karen  
24 -- you contacted Karen to let her know you were  
25 cancelling the meeting.

1 Q. Do you remember in August, and in  
2 particular, August 26, 2010, that there was a  
3 conference call addressing negative feedback  
4 from Dez Kerr, K-e-r-r, and Dez is D-e-z, a  
5 Unilever managing consultant, and Afshin? Do  
6 you remember that in August of 2010?

7 A. I don't remember. I'll be  
8 honest with you. I'll have to -- there was a  
9 conference call. I do recall the name Dez,  
10 but I don't remember the context of it.

11 Q. Do you remember that it -- it may have  
12 related to your being exited from Unilever four  
13 months prior to the expiration of the term?

14 A. I don't recall that, because I  
15 actually left Unilever in, I believe, December.

16 Q. Yeah. I'm talking about August, end  
17 of August. And I'm telling you that Unilever  
18 wanted you off the account in August.

19 A. I -- this is around the same time I  
20 was requesting to --

21 Q. No, it isn't.

22 A. Yes, it is. It is.

23 Q. Okay. All right.

24 A. It is.

25 Q. If that's your recollection, then

1 document here, she must have called me.

2 Q. Okay. Do you recall reaching out to  
3 or communicating with David Upton about this  
4 feedback?

5 A. I didn't have enough time because they  
6 dismissed me right away.

7 Q. Okay. You were dismissed right after  
8 this, correct?

9 A. Mm-hmm.

10 Q. Okay. I'm sorry. Just for the  
11 record, yes?

12 A. Yes. They -- they dismissed me right  
13 after.

14 Q. Okay. Do you recall being advised  
15 that Capital Group didn't want you working with  
16 them any longer?

17 A. Yeah. Jayne told me that they don't  
18 want you as a PM --

19 Q. Mm-hmm.

20 A. -- over there; however, our  
21 engagement had terminated by February 10th.  
22 So I successfully completed and delivered the  
23 project, and then they had returned business.  
24 Because of my work, BT got an extensive project  
25 with Capital Group.

1 Q. Do you think that you were successful  
2 in working with this client?

3 A. I delivered the product.

4 Q. Mm-hmm.

5 A. And as --

6 Q. But do you believe you were successful  
7 in working with this client?

8 A. For the job I did, yes; however, they  
9 were looking for a more senior program manager  
10 when they gave return business to BT. So they  
11 specifically said we don't want this PM.

12 Q. And that -- the PM that they  
13 specifically didn't want was you?

14 A. That's what it says in here.

15 Q. I know it's what it says in there,  
16 but do you recall that being communicated to  
17 you, that the client wanted to continue working  
18 with BT but just not you?

19 A. That's what Jayne came and told me, --

20 Q. Mm-hmm.

21 A. -- that they don't want me --

22 Q. Do you --

23 A. -- back.

24 Q. Was it communicated -- but you -- but  
25 you still view your performance with this client



1 Q. Do you know why Jayne wanted to  
2 terminate -- terminate your employment?

3 A. It's just she's seeing that I couldn't  
4 -- I asked for leave, I'm a sick person, and I  
5 won't be able to perform, maybe I'll get sick  
6 again, and -- and I would be -- I won't be able  
7 to perform like I have in past.

8 Q. Did she ever say that to you?

9 A. Nobody would say something blatantly  
10 like that.

11 Q. Okay. But you're -- you believe that  
12 that was that was her motivation?

13 A. That's -- the paper trail shows  
14 -- demonstrates that to me.

15 Q. And what paper trail are you referring  
16 to?

17 A. When she downgraded -- started  
18 downgrading my reviews, and -- she even said  
19 -- first she told me to juggle my time while I  
20 went for therapy, and then she puts down on the  
21 PIP that I'm not allowed to take any sick leave.

22 Q. Let's talk about gender discrimination  
23 for a moment.

24 A. Mm-hmm.

25 Q. In what way do you believe that Jayne

1 constraint about working four hours was as a  
2 result of a denial of me working four hours  
3 flextime, which was not -- my client was not  
4 accommodating that, neither was my manager. She  
5 had turned it down.

6 BY MR. BROWN:

7 Q. The flex time?

8 A. Yeah. She --

9 Q. But the block time, --

10 A. The block time, I would have lost my  
11 job, she -- she blatantly said, because I don't  
12 have any other account for you to work on.

13 Q. But would you have been put on the  
14 bench?

15 A. The bench time is only, like, 30 to 60  
16 days, and then you are fired.

17 Q. So could you have been put on the  
18 bench?

19 A. Well, if I was put on -- yeah, I could  
20 have -- she could have put me on bench.

21 Q. And could there have been a position  
22 that opened while you were on the bench that  
23 could have accommodated a four-hour block?

24 A. Yes.

25 Q. Now, let me ask you this, --

1 A. Mm-hmm. It should be 2010.

2 MS. RUBIN: 2010.

3 BY MR. BROWN:

4 Q. Please. Please. The second sentence  
5 reads, Ranade sought treatments from a physician  
6 and advised her employer of her medical  
7 difficulties and course of treatment in the  
8 July/August 2011 time frame.

9 Should the 2011 be 2010?

10 A. Yes.

11 Q. Okay. After October 6th, 2010, --

12 A. Mm-hmm.

13 Q. -- upon your working full time --

14 A. Mm-hmm.

15 Q. -- with no medical restrictions, was  
16 the issue of leave ever raised by Jayne  
17 Charlton?

18 A. No.

19 Q. Was the issue of leave raised by any  
20 manager of BT after October 6th?

21 A. No.

22 Q. Okay. Was the issue of leave raised  
23 by anyone at BT?

24 A. Not at -- I don't believe in that  
25 -- this was an issue only between myself and

1 Jayne or anyone else was privy of that, you  
2 know, and --

3 Q. Okay. I just wanted to know if it was  
4 mentioned by anyone at BT ever again after  
5 October 6th?

6 A. I don't recall.

7 Q. Okay. Okay. I -- I believe you  
8 mentioned the name earlier Patricia Carter?

9 A. Yeah.

10 Q. Who is -- who is that?

11 A. I believe she's HR person. I -- I  
12 might have -- I might be wrong. So please don't  
13 quote me on that. I -- I really -- you know, I  
14 have no recollection. There's so many people.

15 Q. Okay. Do you have any recollection of  
16 any interactions you may have had with Patricia  
17 Carter?

18 A. I -- I did -- approached her for  
19 something. I can't remember what, though. I  
20 just -- her name stayed with me for some reason,  
21 but I don't recall what I had approached her  
22 for.

23 Q. Okay. I'll show you next in order.

24 THE REPORTER: That is Number 26.

25 MR. BROWN: Thank you.

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1 she was -- I don't exactly remember our  
2 conversation, but she agreed with me to go, you  
3 know, get some help.

4 Q. Mm-hmm. After that July conversation  
5 that you just relayed to us, --

6 A. Mm-hmm.

7 Q. -- was there any other conversation  
8 prior to the leave issue that we were discussing  
9 that was, I guess, September 21st or 23rd?

10 A. I don't recall any other leave matter  
11 prior to that.

12 Q. And -- and -- and separate from the  
13 leave matter, as it related to your neck, as it  
14 related to your medical condition, any other  
15 conversations with Jayne other than in July of  
16 2010?

17 A. You mean just taking two weeks'  
18 vacation?

19 Q. Well, I'm not going to suggest what  
20 it is, but did you have any conversations with  
21 Jayne about your medical condition, other than  
22 in July of 2010, how you were progressing,  
23 whether it was hurting?

24 A. I had -- I had -- I had another  
25 medical issue, a surgery, actually, in -- in,

## **Exhibit 2**

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF VIRGINIA  
3 ALEXANDRIA DIVISION  
4 \_\_\_\_\_  
5 NADINE RANADE, )  
6 )  
7 Plaintiff, )  
8 vs. ) CASE NUMBER  
9 BT AMERICAS, INC., ) 1:12 CV1039  
10 Defendant. )  
11 \_\_\_\_\_ )

12 VANCE G. PEARSON,  
13 Leesburg, Virginia  
14 Thursday, August 1, 2013

15 called for examination by counsel on behalf of the  
16 Plaintiff, Nadine Ranade, Pursuant to Notice taken in  
17 the Offices of Annette K. Rubin, 18 Liberty Street  
18 Southwest, Leesburg, Virginia 20175, at approximately  
19 10:00 a.m., before Janie Arriaga, a certified Verbatim  
20 Reporter, and a Notary Public in and for the  
21 Commonwealth of Virginia when there were present on  
22 behalf of the respective parties.

Gregory Edwards, LLC  
866 4 Team GE

1 A Uh-huh.

2 Q Now, with respect to poor performance, just so  
3 we're clear, can you give me in a nutshell the reasons  
4 for Nadine Ranade's termination?

5 MS. GUERRASIO: Objection.

6 A She was removed from -- she is -- was a  
7 consultant, a senior consultant, and three different  
8 clients asked her to be removed from their accounts.

9 BY MS. RUBIN:

10 Q For that reason she was terminated?

11 A Correct.

12 Q Have you had an opportunity to look into each  
13 of those circumstances?

14 A Yes.

15 Q With respect to the -- Ms. Ranade was placed  
16 in a performance improvement plan by BT Americas; is  
17 that right?

18 A Correct.

19 (Exhibit No. 4 was marked for identification.)

20 BY MS. RUBIN:

21 Q I'm going to show you a document. Again,  
22 please ignore my handwriting on the top with Delta



1       number 10. That was taken from Ms. Ranade's deposition  
2       actually.

3               May I ask you to look at that document, the  
4       performance improvement plan, and tell me if you've seen  
5       it before.

6           A     I have.

7           Q     And have you reviewed it in preparation for  
8       this case?

9           A     I have.

10          Q     This testimony, rather.

11               I wanted to ask you, actually, a couple of  
12       things about this. A monitoring period -- this talks  
13       about the performance plan start date being September  
14       14, 2010, up in the caption.

15          A     Yes.

16          Q     It says across from that, the monitoring  
17       period is going to be 90 days?

18          A     Yes.

19          Q     Is that the longest monitoring period that's  
20       available for a performance improvement plan?

21          A     As a practice, yes.

22          Q     So a performance improvement plan could have a

1 monitoring period of as little as 30 days, at least  
2 that's indicated on the form?

3 A Correct.

4 Q Do you know how the decision was made to have  
5 the monitoring period extend for 90 days in Ms. Ranade's  
6 case?

7 A No.

8 Q Have you had an opportunity to talk to anybody  
9 about that?

10 A With her performance improvement plan, I  
11 believe they extended it longer than 90 days according  
12 to Ms. Charlton, because of the time Ms. Ranade was out.  
13 And so the 90 days they felt was enough time for her to  
14 be able to turn her performance around and be  
15 successful. So they gave her the longest amount of  
16 time, and then they extended it because she had been out  
17 on leave.

18 Q How long had she been out on leave?

19 A Well, she went out on leave while she was on  
20 her performance improvement plan.

21 Q Was she out for an extended period?

22 A I believe her leave ended up being two weeks.

1 incidents that led to that criticism of her performance?

2 A Yes. One of the -- one of the incidents was  
3 at Proctor and Gamble. She was placed on the Proctor  
4 and Gamble account, and she failed to work effectively  
5 and communicate effectively with her client who was in  
6 charge of one of the data centers at Proctor and Gamble.

7 Q Do you know which one?

8 A It was a very strange name town in Ohio.

9 Q Mehoopany?

10 A Yes.

11 Q I think it's Pennsylvania.

12 A Is it Pennsylvania? I don't really know. But  
13 it's a very strange town.

14 Q Mehoopany. So the Mehoopany project?

15 A Yes.

16 Q That was one of the events -- or her  
17 performance on the project was one of the events leading  
18 to her placement on this PIP?

19 A Correct.

20 Q Any other specific projects like that that led  
21 to her being placed on this PIP?

22 A There were issues at the Unilever account.

1 Q And that would be?

2 A I don't know.

3 Q And Afshin Safari is a BT employee?

4 A At that time he was.

5 Q And what was his title?

6 A I don't know, but he served as the account  
7 manager for the U.S. portion of the Unilever account.

8 Q What was the reason given for them asking her  
9 to be removed from the account?

10 A Some of the reasons that were given -- or the  
11 reasons that were given were her lack of communications,  
12 their inability to be able to find her, her  
13 communications with the client.

14 Q Were there any -- I'm sorry, I interrupted  
15 you. Communications and not being able to find her?

16 A Yes.

17 Q Anything else?

18 A I think there were other things. I don't  
19 remember exactly what they were, but there were numerous  
20 concerns that they had with her. Just her general  
21 demeanor with the team was not good.

22 Q Demeanor with the team.

1       them.

2           Q     Any specific events occurring at Unilever that  
3       gave rise to this PIP?

4           A     I don't remember exactly what those were.

5           Q     Are you looking at page 3 of this document?

6           A     Uh-huh.

7           Q     Where it talks about the previous discussions  
8       in about the middle of the page, under 7/30/2010, the  
9       note is: Met in office with Nadine for one-to-one first  
10      quarter performance rating, performance on Unilever.  
11      And then it says: Feedback received about PT.

12                   Do you know what PT stands for?

13                   MS. GUERRASIO: Objection. You can answer.

14           A     Personal time, I would imagine.

15      BY MS. RUBIN:

16           Q     Could it be part time?

17           A     No, I don't think so. It could have been,  
18       because I think they could have -- no. Wasn't that  
19       before she was on leave?

20           Q     The doctor's certificate is dated September  
21       21, but I believe there had been some discussion before  
22       that with her boss.

1 MS. GUERRASIO: Objection.

2 BY MS. RUBIN:

3 Q I want to know what PT means.

4 A I don't know. You'd have to ask Jayne. But  
5 that was long before anybody -- I mean before her FMLA.

6 Q It was before the September 21 request, yes.

7 A Yes.

8 Q So, yes, it's dated July 30th.

9 A So it was long before she even asked for FMLA,  
10 so I don't --

11 Q Do you know whether she had any  
12 conversations --

13 A Maybe it was about her physical therapy. I  
14 know that she went to physical therapy, and Jayne  
15 allowed her to go to that. But that's just my guess. I  
16 don't know what PT means. It could be that and it could  
17 be lots of things.

18 MS. GUERRASIO: We only want you to testify as  
19 to what you know.

20 BY MS. RUBIN:

21 Q Right. Speculation --

22 A Is not good.

1 A No.

2 Q One does not exist?

3 A One does not exist.

4 Q That would explain why I don't have one.

5 Okay. How was the termination delivered to

6 Ms. Ranade?

7 A It would have been delivered in person.

8 Q Verbally?

9 A Yes.

10 Q And who would have delivered the termination  
11 notice?

12 A Jayne Charlton.

13 Q Who was the decision maker with respect to the  
14 decision to terminate Ms. Ranade's employment?

15 A Jayne Charlton.

16 Q Anyone else?

17 A She had the final decision.

18 Q All right. Let me ask you to -- oh, kind of a  
19 little bit of off subject. Have you ever heard the  
20 phrase "internal swap out"?

21 MS. GUERRASIO: Objection. You can answer.

22 A That is just taking one consultant to another,

1 from one client to another. Swapping people.

2 BY MS. RUBIN:

3 Q How are people assigned to the various  
4 projects?

5 A Based on their skill sets.

6 Q And the decisions made about that are made by  
7 their managers at what level?

8 A The business comes in and says what they need,  
9 and the -- it's done in a group setting. And they'll  
10 come through, and they will say what projects are open  
11 and what skills they're looking for. So say you need a  
12 link developer, they will come through, and the people  
13 managers will say, I have someone who knows link and is  
14 on the bench and is available, and they can be assigned  
15 to it or not.

16 It also has to do with your location. It has  
17 to do with lots of different factors.

18 Q So with respect to Nadine Ranade, would Jayne  
19 Charlton have been the matchmaker between the projects  
20 and their needs and Nadine's skill sets and her  
21 abilities?

22 A Correct.



1 Q And that was someone whose job was to what?

2 A She had a job on the account that Ms. Charlton  
3 had asked her to also mentor Nadine so that she could be  
4 successful on the account, so to help her through and to  
5 coach her when needed on the account.

6 Q How long was that assignment with the Capital  
7 Group?

8 A I don't remember how long it was. It was not  
9 a long assignment.

10 Q Does ten weeks sound about right?

11 A I don't know. I wouldn't guess.

12 Q Do you know whether Ms. Ranade's deliverable  
13 was achieved on that account?

14 A It was.

15 Q Do you know whether the ten weeks or whatever  
16 the duration was, do you know whether that time had  
17 completed?

18 A I believe it had.

19 Q Do you know if BT got any follow-on work with  
20 Capital Group?

21 A They did.

22 Q After this project that Nadine Ranade had been

1 on?

2 A They were given follow-on work, and they were  
3 told that they would only get follow-on work if she was  
4 not the project manager. They would not be given any  
5 work if she was the project manager.

6 Q Who said that?

7 A The company told Capital Group that -- I mean,  
8 Capital Group told BT that.

9 Q Who in Capital Group?

10 A I don't know. They told Dave Upton that.

11 Q Okay. Do you know if there's anything in  
12 writing from Capital Group that references that?

13 A Not that I have seen.

14 Q Is there anything in writing from Capital  
15 Group that you've seen that expresses any displeasure  
16 with Ms. Ranade or would that all have been coming from  
17 Dave Upton?

18 A It call came from Dave Upton.

19 Q After Capital Group, was there any effort to  
20 find another project for Ms. Ranade to work on?

21 A I don't know. I don't think so. But I don't  
22 know.

1       need to work on a flexible schedule coming from the  
2       client?

3                   MS. GUERRASIO: Objection.

4           A       No. She wanted to work a flexible schedule  
5       because of her client, but we said we were not able to  
6       accommodate that and went to the customer and said, this  
7       is what we can accommodate, can you accommodate that.

8       BY MS. RUBIN:

9           Q       What did the customer say?

10          A       The client said they were not able to  
11       accommodate that, because they had previously asked that  
12       she be removed, but they'd made a decision that based on  
13       where the project was, she wouldn't be; but they could  
14       not do this on top of that.

15          Q       Was that because they needed to have coverage  
16       for meetings and other activities that would possibly  
17       occur outside of the static 8:00 to 1:00 schedule?

18          A       They felt that they needed to have her when  
19       they needed her for as long as they needed her, and they  
20       could not guarantee that they would only need her for  
21       four hours on any given day.

22          Q       So ultimately, Ms. Ranade withdrew her request

1 schedule. According to my conversation with Jayne  
2 Charlton, the client didn't say they could accommodate  
3 her flexible schedule. They said they needed her when  
4 they needed her, whatever time they needed her, for  
5 whatever length of time they needed her. So they could  
6 not guarantee her only four hours a day. And that was  
7 the restriction that she had, that she only work four  
8 hours a day.

9 Q So at this point in October of 2010, what  
10 other contracts could Ms. Ranade have been assigned to?

11 A As with her accommodations of only four hours,  
12 I don't know if there would be any available. I would  
13 be surprised if there was anything that was available  
14 for those restricted hours. She would have been placed  
15 on the bench for the four hours that she was available  
16 to work.

17 Q And do you know what efforts, if any, Jayne  
18 Charlton made to find another project that could  
19 accommodate this intermittently request?

20 A I don't know if she did or did not.

21 Q And I injected a new term there,  
22 "intermittently request." Is that what BT understands

1 A Yes.

2 Q And would that have been a disability benefit  
3 that would have been available for someone on a  
4 restricted schedule or do you know?

5 A Yes.

6 Q Do you know what communication took place with  
7 respect to Ms. Ranade's qualification for that  
8 disability benefit?

9 MS. GUERRASIO: Objection. You can answer.

10 A She would be required to have completed all of  
11 the forms for short-term disability and submit them to  
12 the vendor, and they would have made that determination.

13 BY MS. RUBIN:

14 Q Okay. And who was the vendor for short-term  
15 disability at that time that would have been --

16 A Cigna.

17 Q Cigna?

18 A Uh-huh.

19 Q Do you know whether there was any effort  
20 made -- I may have asked you this, if I have forgive  
21 me -- to find another project in the October time frame  
22 when this e-mail was written?

1 MS. GUERRASIO: Objection.

2 A I don't know if there was any effort made at  
3 that point.

4 BY MS. RUBIN:

5 Q Ms. Ranade was not benched at this point; is  
6 that correct, also?

7 A I would have to -- I would have to check, but  
8 if she -- she may have still been on Unilever. If she  
9 was not, she would have been on the bench and still  
10 receiving pay for four hours a day.

11 Q Right, and still having the same  
12 responsibilities that a benched person has, to come to  
13 the office and engage in professional development that  
14 we talked about before?

15 A Correct.

16 Q Is Steve Kurtz a BT employee?

17 A Yes.

18 Q And David Upton is as well?

19 A Yes.

20 Q Debra Gessel, is she a BT employee?

21 A Yes.

22 Q Have you contacted any non BT employees in

## **Exhibit 3**

**From:** Charlton, Jayne  
**Sent:** Thursday, September 16, 2010 11:57 AM  
**To:** Ranade, Nadine  
**Cc:** Charlton, Jayne  
**Subject:** RE: Nadine Ranade PIP 9-14-10 v2

Nadine, this is a summary of what I was told when your early removal was changed to 100% thru Sept and 50% Oct thru Dec. You may not "agree" with it, but it was the reasoning provided to me by Dez when I inquired. In other words, ~~their need for your continued PM skills on work effort was more urgent and priority than the negative behaviors or perceptions, so they decided it took precedence over the original issue they had with you when they requested your premature departure.~~

We really need to work together on how you view your agreement on things vs. truly hearing and considering feedback and perceptions from others with real ownership and desire to change. I believe this is a critical underlying factor in some of the issues you have faced. Have you heard the statement that "perception is reality"? If a client or key stakeholder develops a perception about you based on their opinions or trends, then a professional has to figure out a way to hear and accept that people have those perceptions or thoughts about them. Rather than arguing or debating through them, it is much more effective to humbly seek to understand, introspectively evaluate from an objective point of view and with some degree of personal ownership and desire to improve how they could possibly have come



to that perception, i.e. what behaviors/actions/things said/not said you may have contributed to this perception.

I hope this makes sense and we will continue to discuss in detail. Thanks.

Kind Regards,

Jayne Charlton, PMP

Jayne Charlton | Managing Consultant | Reston, VA | BT Business Solutions Group | Mobile 1 571-236-3418 | Office 1 540-727-7987 | Email: [jayne.charlton@usc-bt.com](mailto:jayne.charlton@usc-bt.com)

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BT INS Inc, 1600 Memorex Drive, Suite 200, Santa Clara California 95050-2842 United States

**From:** Ranade, Nadine  
**Sent:** Thursday, September 16, 2010 10:58 AM  
**To:** Charlton, Jayne  
**Subject:** RE: Nadine Ranade PIP 9-14-10 v2

Jayne,

I disagree with the clause "HR MC was told that even though the issues/reason for why Nadine was asked to depart still existed that due to the urgency of their project deliverables and inability to find/train another PM, they made a decision". We can talk about this at the next meeting.

Regards,  
Nadine

**From:** Charlton, Jayne  
**Sent:** Thursday, September 16, 2010 10:39 AM  
**To:** Ranade, Nadine  
**Cc:** Charlton, Jayne  
**Subject:** Nadine Ranade PIP 9-14-10 v2

## Exhibit 4



*"Quality and consistency is what you can expect from our clinics. Professional excellence with a personal touch."*

Richard Jackson, PT, OCS

<b>Patient:</b>	Nadine Ranade	<b>Facility:</b>	World Gate
<b>Case ID:</b>	118563	<b>Phone:</b>	703-689-3164
<b>Date of Birth:</b>	08/15/1964	<b>Fax:</b>	703-689-3167
<b>Gender:</b>	F	<b>Referring Physician:</b>	Vijaya L Gorle MD
<b>Visits:</b>	12	<b>See Also:</b>	<input type="checkbox"/> M.D. Report
<b>Scheduled Visit:</b>	10/11/10 3:00PM		<input type="checkbox"/> Exercise Chart

**Patient Diagnosis:** C/S pain

**Patient Reported:** has returned to work but still working from home. I got up from the computer and went outside and when lunch time came around did not eat in front of the computer I went into the other room and ate.

**Objective Findings:** Con't hypertonic L levator with reproduction primary c/o pain on L with forward flx. Decreased L C/S rotation vs R with L sided tightness. - MNT and RNT L UE

**Treatment**

**Therapeutic exercise:** Per flow sheet with directed supervision said she had to get back to work. UBE 5' lvi 3

**Therapeutic activities:** HELD: review with pt demo self release with use of hand L levator or stretch-out strap with L shoulder depression and repeated C/S rotation and forward flexion to determine effective dosage.

**Neuromuscular re-ed:** Cueinf for scapular and C/S neutral in sitting and with computer use with improved mad and lower trap facilitation in sitting and reduced dominance levator and rhomboids

**Gait training:**

**Muscle stretching:** L scalenes and SCM with pt in sitting and supine x 2

**Post-iso relaxation:**

**Soft tissue mobilization:** Functional release L levator, UT in sitting with repeated C/S rotation B and Forward flexion with emphasis upper C/S flexion x 5. L SCM with pt supine. B axillary release and pec minor with varying degrees shoulder scaption PROM pt supine.

**Neural mobilization:**

**Joint mobilization:** Side glides GVII, CPA's T2T3T4 pt prone GIV x 2

**Manual / Mech Traction:**

**Modalities:**

**Instruction home exercise:** per flow sheet with written instructions and pt demo

**Joint strapping:**

**Other:** Con't emphasis on limiting time spent in front of computer at 30' with breaks to unload con't irritated and hypertonic L scalenes,

**DME issued:**

**Assessment:** Very frustrated that pt rarely has time for ther ex with need to get back to work. Able to restore symmetrical B C/S rotation but limited compliance to ther ex and carry over from neuro re ed. Limited ability to balance work and stress and symptom management for full recovery.

**Plan:** Con't with neuro re ed for improved posture, joint, soft tissue and neural mobs with ther ex and HEP

**Time In:** **Time Out:** **Total RX Time:** 33'

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Kenneth Herbel, PT, MPT, OC 10/11/10 03:51 PM

BT 000242



*"Quality and consistency is what you can expect from our clinics. Professional excellence with a personal touch."*

Richard Jackson, PT, OCS

## Cervical Evaluation

Patient: Nadine Ranade  
Case ID: 118563  
Visit Date: 10/13/10 3:00PM  
Date of Birth: 08/15/1964  
Gender: F  
Visits in Past 30 Days: 8  
Medical Diagnosis:  
847.0 Neck sprain

Facility: World Gate  
Phone: 703-689-3164  
Fax: 703-689-3167  
Referring Physician: Vijaya L Gorle MD

Treatment Diagnosis:  
723.1 Cervical (neck) pain

## Goals

Resolution of pain, restoration of function, stabilize cervical thoracic region and normalize cervical and shoulder motion.  
Functional goals: Increased computer work tolerance 1 hour with breaks for symptom management improving. Increased lifting tolerance L UE 20# goal met.  
Increase B C/S rotation to 80 degrees improving.

## Functional Limitations

Decreased computer work tolerance. Altered sleep. Decreased L UE lifting tolerance 10#. Decreased B C/S rotation

## Clinical Impressions

Postural imbalance with improved awareness and endurance demonstrated while in clinic  
Decreased AROM  
Decreased strength of C/S stabilizers  
Hypertonic upper quarter musculature  
Adaptive shortening of anterior chest and posterior C/S muscles  
Restricted mobility suboccipital  
Pt reports feeling good enough that she has returned to work on more regular basis  
Patient's rehab potential is fair to make significant functional gains in a reasonable length of time with the skilled intervention of the physical therapist.

## Recommendations

Postural education and awareness training  
Inhibition techniques to reduce hypertonicity  
Lengthening and graduated stretching of involved musculature  
Soft tissue mobilization  
Joint mobilization  
Cervical stabilization training  
General/cardiovascular conditioning  
Instruction in home exercise program

Frequency 2 x weeks 3



Patient: Nadine Ranade

Chief Complaint: Pt reports decreased pain with periods of time of no pain. Improved computer work tolerance and self management of symptoms.

HX: Onset C/S pain after MVA 1998 with prior intervention of PT, chiropractic and injections that have helped but of limited duration. present L sided C/S pain that increases with B rotation, flx and ext. Denies any N/T L UE but some pain into L shoulder that increased with lifting anything heavier than 10#. HA's 2-3/month.

Co-Morbidities: Denies per pt verbal review

Pain 4 / 10 40.0 % Function: 3 / 24 12.5 % NDI: 8 / 50 16.0 %

Makes Worse: lifting greater than 10#, moving my neck at all

Makes Better: nothing

Diagnostics X-Ray 1998

MRI 1998

PMH: Denies with pt verbal review

Med. / Dosage: flexeril and tylenol prn

Func. Status: working full time unrestrictcd

Prior / Current:

## Systems Review

HR: BP: O2 Sat: Height (in.): Weight (lbs): BMI:

☒ NT/Ref☒ NT/Ref☒ NT/Ref☒ NT/Ref☒ NT/Ref

Respiration:

Filament Test:

☐ NT/Ref☐ NT/Ref

## Neuro Scan:

MMT	<input type="checkbox"/> NT	Prev. R	Prev. L	Right	Left		Prev. R	Prev. L	Right	Left
C5 Deltoid, Supra		4+/5pn	4+/5pn	WNL	WNL	Mid Trap	4/5	4/5	WNL	WNL
C5-6 Biceps		4+/5pn	4/5	WNL	WNL	Lower Trap	4/5	4/5	WNL	WNL
C6 Wrist Ext		WNL	WNL	WNL	WNL	Rhomboids	WNL	4+/5pn	WNL	WNL
C7 Wrist Flex		WNL	WNL	WNL	WNL	Shoulder Shrug	4+/5	4/5pn	WNL	WNL
C8 Finger Flex		WNL	WNL	WNL	WNL	Serratus	WNL	WNLpn	WNL	WNL
T1 Interossei		WNL	WNL	WNL	WNL					

Sensory: intact to light touch B UE's

Reflexes: 1+ grossly B UE's

BPTT (Check Indicates Positive Result) - ☐ NT☐ Ulnar Right☐ Ulnar Left☐ Radial Right☐ Radial Left☐ Median Right☐ Median Left

## Special Tests (Check Indicates Positive Result)

☐ VA☐ ALAR☐ Transverse☐ Hoffman's ReflexCranial Nerve Tests (Check Indicates Positive Result) - ☒ NT☐ 1 Soap Smell☐ 8v Tilt, hallpike-dix, rhomberts, stance tests☐ 2 Confrontation☐ 8c Finger rustle, hum☐ 3 E-W Consensual light reflex☐ 10 Uvula displacement☐ 3,4,6 Tracking, convergence☐ 11 Scm and u.t. mmt, u.t. reflex / clonus☐ 5 facial sensation, jaw jerk, jaw clonus☐ 12 Tongue protrusion☐ 7 Smile / frown

## Observation Sitting and Standing:

Posture: Forward head chin poke with B protracted slouched shoulder sitting posture

Therapist: Kenneth Herbel, PT, M  
Page: 2 of 3



146AM BT 000244

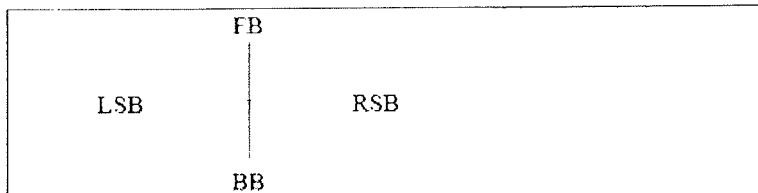
Patient: Nadine Ranade

Patient:		Nadine Ranaide					
C-Spine - ACTIVE	Prev. R	Prev. L	Right	Left		Previous	Current
Rotation (90)	62 pnL	58pnL	72	75 tight	Forward Bend (60)	23 pn L	57
Sidebend (45)	30 pn L	31 pn L	43	44	Backward Bend (60)	13 pn L	54
C-Spine - OP	<input checked="" type="checkbox"/> NT	Prev. R	Prev. L	Right	Left	Previous	Current
Rotation (90)					Forward Bend (60)		
Sidebend (45)					Backward Bend (60)		
C-Spine - RES.	<input type="checkbox"/> NT	Prev. R	Prev. L	Right	Left	Previous	Current
Rotation (90)	+	+	-	-	Forward Bend (60)	+	-
Sidebend (45)	+	+	-	-	Backward Bend (60)	+	-

## C-Spine - BIO MECH

Subocc: Restricted bilateral rotation  
 Facets: WNL  
 Hypermobility: WNL  
 Thoracic: T1-2-3: Restricted bilateral rotation  
 Clavicle: WNL

Compression: No Change  
 Distraction: Decreasing



## Papation

Discs:

Facets:

Musculature	Prev. R	Prev. L	Right	Left		Prev. R	Prev. L	Right	Left
SCM	+	+	-	+	Lower Trapezius	-	-	-	-
Scalenus Anterior	+	+	-	+	Levator Scapula	+	+	-	+
Scalenus Medius	-	+	-	+	Supra Spinatus	+	+	-	-
Scalenus Posterior	-	-	-	-	Infra Spinatus	+	+	-	-
Upper Trapezius	-	-	-	-	Rhomboids	+	+	-	-
Middle Trapezius	-	-	-	-					

Muscle Tension	Prev. R	Prev. L	Right	Left		Prev. R	Prev. L	Right	Left
SCM	+	+	-	-	Lower Trapezius	+	+	-	-
Scalenus Anterior	-	-	-	-	Levator Scapula	+	+	-	-
Scalenus Medius	-	-	-	-	Supra Spinatus	-	-	-	-
Scalenus Posterior	-	-	-	-	Infra Spinatus	-	-	-	-
Upper Trapezius	-	-	-	-	Rhomboids	+	+	-	-
Middle Trapezius	-	-	-	-					

Muscle Flexibility: Restrictions noted in left SCM, left levator scapulae, , right pec major, , right pec minor,

Other	Prev. R	Prev. L	Right	Left		Prev. R	Prev. L	Right	Left
Nuchal Ligament	-	-	-	-	Scalenus Triangle	-	-	-	-
Subcoracoid Triangle	-	-	-	-	TMJ Scan	WNL	WNL	WNL	WNL

## Misc Notes

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 Kenneth Herbel, PT, MPT, OC 10/13/10 06:41 PM





**the JACKSON**  
**CLINICS**  
*hands on physical therapy*

*"Quality and consistency is what you  
can expect from our clinics. Professional  
excellence with a personal touch."*

Richard Jackson, PT, OCS

<b>Patient:</b>	Nadine Ranade	<b>Facility:</b>	World Gate
<b>Case ID:</b>	118563	<b>Phone:</b>	703-689-3164
<b>Date of Birth:</b>	08/15/1964	<b>Fax:</b>	703-689-3167
<b>Gender:</b>	F	<b>Referring Physician:</b>	Vijaya L. Gorle MD
<b>Visits:</b>	13	<b>See Also:</b>	<input checked="" type="checkbox"/> M.D. Report
<b>Scheduled Visit:</b>	10/13/10 3:00PM		<input checked="" type="checkbox"/> Exercise Chart

**Patient Diagnosis:** C/S pain

**Patient Reported:** Pt reports decreased pain with periods of time of no pain. Improved computer work tolerance and self management of symptoms.

**Objective Findings:** See progress note for details. Improved C/S mobility in all functional planes.

**Treatment**

**Therapeutic exercise:** Per flow sheet with directed supervision

**Therapeutic activities:** Review with pt demo self release with use of hand L levator or stretch-out strap or hand with L shoulder depression and repeated C/S rotation and forward flexion to determine effective dosage.

**Neuromuscular re-ed:** Cueing for scapular and C/S neutral in sitting and with computer use with improved mad and lower trap facilitation in sitting and reduced dominance levator and rhomboids

**Gait training:**

**Muscle stretching:** L scalenes and SCM with pt in sitting and supine x 2

**Post-iso relaxation:**

**Soft tissue mobilization:** Functional release L levator, UT in sitting with repeated C/S rotation B and Forward flexion with emphasis upper C/S flexion x 5. L SCM with pt supine. B axillary release and pec minor with varying degrees shoulder scaption PROM pt supine.

**Neural mobilization:**

**Joint mobilization:** Side glides GVII, CPA's T2T3T4 pt prone GIV x 2

**Manual / Mech Traction:**

**Modalities:**

**Instruction home exercise:** per flow sheet with written instructions and pt demo

**Joint strapping:**

**Other:**

**DME issued:**

**Assessment:** See progress note for details. Pt would benefit from further PT intervention.

**Plan:** Progress note for details. Con't with soft tissue and joint mobs as indicated with increased emphasis on ther ex and independent mngr.

**Time In:** **Time Out:** **Total RX Time:** 50'

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Kenneth Herbel, PT, MPT, OC 10/14/10 06:55 AM

BT 000246

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<b>Flow Sheet</b>		<b>Dx:</b> 847.0 Neck sprain 723.1 Cervical (neck) pain
<b>Patient:</b>	Nadine Ranade	
<b>Case ID:</b>	118563	

[illegible]

	PTA Initials	cew	kaw	cw		kaw	kaw
--	--------------	-----	-----	----	--	-----	-----

<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>					pt left		
<input type="checkbox"/>	UBE:	8' lvl 2	8' lvl 2	8' c pt	8' lvl 3	8' lvl 2	8' lvl 2
<input type="checkbox"/>							

TOTAL EXERCISE TIME	27' +UBE	11:55 15' +UBE	3:55 27' +UBE	30' + UBE--cw	20' cw	6:00 28'+UBE
---------------------	----------	----------------	---------------	---------------	--------	--------------

**DIGITAL SIGNATURE ON FILE**

Kenneth Herbel, PT, MPT, OC      10/14/10 06:55 AM

BT 000247





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Richard Jackson, PT, OCS

<b>Patient:</b>	Nadine Ranade	<b>Facility:</b>	World Gate
<b>Case ID:</b>	118563	<b>Phone:</b>	703-689-3164
<b>Date of Birth:</b>	08/15/1964	<b>Fax:</b>	703-689-3167
<b>Gender:</b>	F	<b>Referring Physician:</b>	Vijaya L Gorle MD
<b>Visits:</b>	14	<b>See Also:</b>	<input checked="" type="checkbox"/> M.D. Report
<b>Scheduled Visit:</b>	10/20/10 3:00PM		<input checked="" type="checkbox"/> Exercise Chart

**Patient Diagnosis:** C/S pain

**Patient Reported:** Patient stated that she has been feeling much better. She only has pain through L sided upper trap muscle. She stated that self-release has been very helpful for her that she learned during last therapy session.

**Objective Findings:** See progress note for details. Improved C/S mobility in all functional planes.

**Treatment**

**Therapeutic exercise:** Per flow sheet with directed supervision

**Therapeutic activities:**

**Neuromuscular re-ed:** held: Cueing for scapular and C/S neutral in sitting and with computer use with improved mad and lower trap facilitation in sitting and reduced dominance levator and rhomboids

**Gait training:**

**Muscle stretching:** L scalenes and SCM with pt in sitting and supine x 2

**Post-iso relaxation:**

**Soft tissue mobilization:** Functional release L levator, UT in sitting with repeated cervical rotation B and Forward flexion x10. L SCM with pt supine. B axillary release and pec minor with varying degrees shoulder scaption PROM pt supine.

**Neural mobilization:**

**Joint mobilization:** Stabilization of T1-2 with resisted B cervical rotation x3 each way. Side glides GVII Held: CPA's T2T3T4 pt prone GIV x 2

**Manual / Mech Traction:**

**Modalities:**

**Instruction home exercise:**

**Joint strapping:**

**Other:**

**DME issued:**

**Assessment:** Patient tolerated session well. She reported decreased tightness through UT with forward flexion and R sidebend after intervention. Pt would benefit from further PT intervention.

**Plan:** Progress note for details. Con't with soft tissue and joint mobs as indicated with increased emphasis on ther ex and independent mngt.

**Time In:** **Time Out:** **Total RX Time:** 59'



<b>DIGITAL</b>	<b>DIGITAL SIGNATURE ON FILE</b>	<b>PRIMARY</b>	<b>DIGITAL SIGNATURE ON FILE</b>	<b>SECONDARY</b>
R. Ben Keeton, PT, DPT, OCS	10/20/10 10:08 PM	Erin Dillaman, PT, DPT	10/20/10 05:43 PM	

BT 000248

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Flow Sheet		DX: 847.0 Neck sprain 723.1 Cervical (neck) pain
Patient:	Nadine Ranade	
Case ID:	118563	

Notes:

 <b>DIGITAL SIGNATURE ON FILE</b> 		 <b>DIGITAL SIGNATURE ON FILE</b> 	
R. Ben Keeton, PT, DPT, OCS	10/20/10 10:07 PM	Erin Dillaman, PT, DPT	10/20/10 05:43 PM

BT 000249

BT 000249



*"Quality and consistency is what you can expect from our clinics. Professional excellence with a personal touch."*

Richard Jackson, PT, OCS

<b>Patient:</b>	Nadine Ranade	<b>Facility:</b>	World Gate
<b>Case ID:</b>	118563	<b>Phone:</b>	703-689-3164
<b>Date of Birth:</b>	08/15/1964	<b>Fax:</b>	703-689-3167
<b>Gender:</b>	F	<b>Referring Physician:</b>	Vijaya L Gorle MD
<b>Visits:</b>	15	<b>See Also:</b>	<input checked="" type="checkbox"/> M.D. Report
<b>Scheduled Visit:</b>	10/25/10 1:30PM		<input checked="" type="checkbox"/> Exercise Chart

**Patient Diagnosis:** C/S pain

**Patient Reported:** Continuing to feel better, not sure she has all the technique right with each home exercise

**Objective Findings:** Impaired cervical mobility at end ranges. Impaired knowledge of correct dosage and technique with pain management interventions at home

**Treatment**

**Therapeutic exercise:** Per flow sheet with directed supervision

**Therapeutic activities:** test:intervene:re-test model for all pain control interventions to help manage symptoms when they come up at home (30 min)

**Neuromuscular re-ed:** held: Cueing for scapular and C/S neutral in sitting and with computer use with improved mad and lower trap facilitation in sitting and reduced dominance levator and rhomboids

**Gait training:**

**Muscle stretching:** held: L scalenes and SCM with pt in sitting and supine x 2

**Post-iso relaxation:**

**Soft tissue mobilization:** held: Functional release L levator, UT in sitting with repeated cervical rotation B and Forward flexion x10 L SCM with pt supine B axillary release and pec minor with varying degrees shoulder scaption PROM pt supine

**Neural mobilization:**

**Joint mobilization:** held: Stabilization of T1-2 with resisted B cervical rotation x3 each way. Side glides GVII Held: CPA's T2T3T4 pt prone GIV x 2

**Manual / Mech Traction:**

**Modalities:**

**Instruction home exercise:**

**Joint strapping:**

**Other:**

**DME issued:**

**Assessment:** Improved knowledge of how to manage symptoms at home with exercises she already knows (by changing technique/dosage for max effect)

**Plan:** Progress note for details. Con't with soft tissue and joint mobs as indicated with increased emphasis on ther ex and independent mnrgt.

**Time In:** **Time Out:** **Total RX Time:** 57

**DIGITAL SIGNATURE ON FILE**

R. Ben Keeton, PT, DPT, OCS 10/25/10 10:35 PM

BT 000250





*"Quality and consistency is what you  
can expect from our clinics Professional  
excellence with a personal touch"*

Richard Jackson, PT, OCS

<b>Patient:</b>	Nadine Ranade	<b>Facility:</b>	World Gate
<b>Case ID:</b>	118563	<b>Phone:</b>	703-689-3164
<b>Date of Birth:</b>	08/15/1964	<b>Fax:</b>	703-689-3167
<b>Gender:</b>	F	<b>Referring Physician:</b>	Vijaya L Gorle MD
<b>Visits:</b>	16	<b>See Also:</b>	<input checked="" type="checkbox"/> M.D. Report
<b>Scheduled Visit:</b>	10/27/10 4:30PM		<input checked="" type="checkbox"/> Exercise Chart

**Patient Diagnosis:** C/S pain

**Patient Reported:** Much betetr in the neck after using the 1st rib strap last visit, thinks it helped a lot

**Objective Findings:** Impaired scalene mobility. Impaired cervical mobility at end ranges. Impaired knowledge of correct dosage and technique with pain management interventions at home

**Treatment**

**Therapeutic exercise:** Per flow sheet with directed supervision

**Therapeutic activities:** test:intervene:re-test model for 1st rib strap on the left to manage pain and create mini-traction to segment

**Neuromuscular re-ed:** held: Cueing for scapular and C/S neutral in sitting and with computer use with improved mad and lower trap facilitation in sitting and reduced dominance levator and rhomboids

**Gait training:**

**Muscle stretching:** L scalenes and SCM with pt in supine

**Post-iso relaxation:**

**Soft tissue mobilization:** held: Functional release L levator, UT in sitting with repeated cervical rotation B and Forward flexion x10. L SCM with pt supine. B axillary release and pec minor with varying degrees shoulder scaption PROM pt supine.

**Neural mobilization:**

**Joint mobilization:** supine 1st rib inferior mobilization. seated 1st rib inferior mobilization

**Manual / Mech Traction:** supine gentle manual traction 10x15" within pt tolerance

**Modalities:**

**Instruction home exercise:**

**Joint strapping:**

**Other:**

**DME issued:**

**Assessment:** Improved overall symnptoms with 1st rib mobilization and may benefit from continued intervention with that focus

**Plan:** Con't with soft tissue and joint mobs as indicated with increased emphasis on ther ex and independent mnngt.

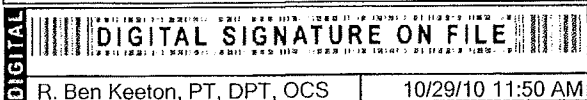
**Time In:** **Time Out:** **Total RX Time:** 40

**DIGITAL SIGNATURE ON FILE**

R. Ben Keeton, PT, DPT, OCS 10/29/10 11:50 AM

BT 000252

Richard Jackson, PT, OCS

[illegible]

BT 000253

## Exhibit 5

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## Performance Document History

Nadine Ranade

Listed below are your completed and cancelled performance documents.

Performance Documents		Customer		First Name		Last Name		First Name		Last Name		Levelled Rating	
UIN	Employee Last Name	First Name	QUC	Country	Document Type	Begin Date	End Date	Job Title	Status	UIN	Manager Last Name	First Name	Levelled Rating
603561502	Ranade	Nadine	JGJ2	United States	Quarterly PR - Manager	10/01/2010	12/31/2010	Lead: DDCS	Completed	604158244	Charlton	Jayne	DN - Development Needed
603561502	Ranade	Nadine	JGJ2	United States	Quarterly PR - Manager	07/01/2010	09/30/2010	Lead: DDCS	Completed	604158244	Charlton	Jayne	DN - Development Needed
603561502	Ranade	Nadine	JGJ2	United States	Personal Objectives	04/01/2010	03/31/2011	Lead: DDCS	Cancelled	604158244	Charlton	Jayne	DN - Development Needed
603561502	Ranade	Nadine	JGJ2	United States	Quarterly PR - Manager	04/01/2010	06/30/2010	Outsourced/Acquisition Employee-Mgr	Completed	604158244	Charlton	Jayne	AS - Achieves Standards
603561502	Ranade	Nadine	JGJ2	United States	Quarterly PR - Manager	10/01/2009	12/31/2009	Outsourced/Acquisition Employee-Mgr	Completed	604158244	Charlton	Jayne	G - Good
603561502	Ranade	Nadine	JGJ2	United States	Quarterly PR - Manager	07/01/2009	09/30/2009	Outsourced/Acquisition Employee-Mgr	Completed	604158244	Charlton	Jayne	VG - Very Good
603561502	Ranade	Nadine	JGJ2	United States	Annual PR - Manager	04/01/2009	03/31/2010	Outsourced/Acquisition Employee-Mgr	Completed	604158244	Charlton	Jayne	G - Good
603561502	Ranade	Nadine	JGJ2	United States	Personal Objectives	04/01/2009	03/31/2010	Outsourced/Acquisition Employee-Mgr	Cancelled	604158244	Charlton	Jayne	VG - Very Good
603561502	Ranade	Nadine	JGJ2	United States	Quarterly PR - Manager	04/01/2009	06/30/2009	Outsourced/Acquisition Employee-Mgr	Completed	604158244	Charlton	Jayne	VG - Very Good
603561502	Ranade	Nadine	JGJ2	United States	Annual PR - Manager	04/01/2008	03/31/2009	Outsourced/Acquisition Employee-Mgr	Completed	604158244	Charlton	Jayne	VG - Very Good

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